

*Co-Counsel for American Electric Power*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

**In re:**

GENERAL MOTORS CORP., *et al.*,

### Debtors.

—x

## Chapter 11

**Case No. 09-50026 (REG)**

(Jointly Administered)

**DECLARATION OF GREGORY T. HOLLAND IN SUPPORT OF OBJECTION OF CERTAIN UTILITY COMPANIES TO MOTION OF DEBTORS FOR ENTRY OF ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 366 (I) APPROVING DEBTORS' PROPOSED FORM OF ADEQUATE ASSURANCE OF PAYMENT, (II) ESTABLISHING PROCEDURES FOR RESOLVING OBJECTIONS BY UTILITY COMPANIES, AND (III) PROHIBITING UTILITIES FROM ALTERING, REFUSING, OR DISCONTINUING SERVICE**

I, Gregory T. Holland, declare as follows:

1. I am the Manager of Credit and Collections, for American Electric Power ("AEP") and have been in that position for 9 years and with AEP for 24 years. In my position as Manager of Credit and Collections for AEP, I assist in the credit and bankruptcy operations of Indiana/Michigan Power Company ("IMPC"), Columbus Southern Power Company ("CSPC") and Southwestern Electric Power Company ("SWEPCO") (collectively, the "AEP Entities").

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of the AEP Entities' business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of the AEP Entities. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of IMPC, CSPC and SWEPCO, I submit this Declaration in support of the *Objection Of Certain Utility Companies To Motion Of Debtors For Entry Of Order Pursuant To 11 U.S.C. §§ 105(a) And 366 (I) Approving Debtors' Proposed Form Of Adequate Assurance Of Payment, (II) Establishing Procedures For Resolving Objections By Utility Companies, And (III) Prohibiting Utilities From Altering, Refusing, Or Discontinuing Service* (the "Objection").

4. In making this Declaration, I am familiar with the contents of the Objection and the *Motion Of Debtors For Entry Of Order Pursuant To 11 U.S.C. §§ 105(a) And 366 (I) Approving Debtors' Proposed Form Of Adequate Assurance Of Payment, (II) Establishing Procedures For Resolving Objections By Utility Companies, And (III) Prohibiting Utilities From Altering, Refusing, Or Discontinuing Service* (the "Utility Motion"). Accordingly, I am aware of the Debtors' offer to provide their utilities with a two-week deposit.

5. It is part of my job responsibility with AEP to: (A) review customer's accounts with the AEP Entities; (B) address credit issues with the AEP Entities' customers; and (C)





Accordingly, the Debtors, like IMPC's other customers, receive approximately

timely pay the bill,

16. Pursuant to their respective Tariffs, IMPC, CSPC and SWEPCO seek adequate assurance of payment from the Debtors in the form of a two-month cash deposit in the amounts set forth herein.